Exhibit No. ___ (KMR-3) Docket UT-090842 Witness: Kristen M. Russell

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Joint Application of

DOCKET UT-090842

FRONTIER COMMUNICATION CORPORATION AND VERIZON COMMUNICATIONS, INC.

for Approval of Indirect Transfer of Control of Verizon Northwest, Inc.

EXHIBIT TO

TESTIMONY OF

KRISTEN M. RUSSELL

STAFF OF

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Service Quality Requirements

November 3, 2009

SERVICE QUALITY REQUIREMENTS

WAC 480-120-439

(3) Missed Appointment Report

- Total # of appointments made (scheduled)
- # of appointments missed
- # of appointments excluded
 - LEC notifies customer 24-hours in advance appt needs to be changed
 - Customer initiates request for new appointment
 - Missed due to force majeure, work stoppage, events beyond LECs control

(4) Installation/Activation of Basic Service Report (480-120-105= standard)

- Total # orders taken (by C.O.) up to 5 access lines
- Orders with due dates > than 5 days as requested by the customer
- Of the total # taken, # of orders unable to be completed in 5 business days (or later as requested by the customer)
- * separate report each quarter of the total # of orders taken in the quarter, # unable to be completed in 90 days

troper etarapes * each 6 months – of the total # of orders taken in 6 months, # unable to be completed in 180 days

(5) Major Outage Report (480-120-412)

<u>ANY</u> company experiencing a major outage > than 48 hours must provide a report within 10 days of the outage

- ✓ description of outage
- √ time, cause, location
- ✓ # of affected access lines
- ✓ duration

(6) Trouble Reports (480-120-438 = standard)

- > number of TRs by C.O., and # of lines served by C.O.
- explanation of causes for each C.O. that exceeds SQ standard
- > presented in a ratio per 100 lines in service
 - causes by CPE, inside wiring, force majeure, events beyond LECs control s/b excluded

(7) Switching Report (480-120-401 = standard)

- Report any problems to the commission
- Identify location of switch performing < standard</p>

^{*}The report must state installation and repair appointments separately.

(8) Trunk Blocking Report (480-120-401 (3) & (5)= standard)

- Report any trunk group < standard</p>
 - Include peak percent blocking levels experienced
 - # of trunks in the trunk group
 - busy hour when peak blockage occurs
 - concerns a standard in 401 (3) or (5)
 - Remedy for trunk groups < standard for 2 consecutive months

(9) Repair Report (480-120-440 = standard)

- # of service interruptions
- # repaired ≤ 48 hours
- # repaired > than 48 hours
- # exempt from repair interval standard
- # of service impairments
- # repaired ≤ 72 hours
- # repaired > than 72 hours
- # exempt from repair interval standard

(10) Business Office / Repair Answering Reports (480-120-133 = standard)

- avg. speed of answer
- transfers to live representatives
- station busies
- unanswered calls

Report only necessary when requested by the commission

STANDARDS

480-120-105 Co. performance standards for installation/activation (4)

- 90% of all orders completed within 5 business days after the order date (or later as requested by the customer) up to 5 access lines **
- 99% of all orders up to 5 access lines within 90 days **
- 100% of all orders up to 5 access lines within 180 days

480-120-438 Trouble Report Standard (6)

- must not exceed 4 TRs per 100 access lines per month for 2 consecutive months, or
- per month for 4 months in any one 12-month period
- does not apply to CPE, inside wiring, force majeure

^{*} Exemptions apply if force majeure, CPE necessary, these orders excluded from the numerator and denominator when calculating the percentage

^{**} Standard waived if the company is a CLEC – but info is still required

480-120-401 Network Performance standards (7)

Switches:

- Dial tone must be provided within 3 seconds on 98% of calls placed
- 98% of calls placed must not encounter intraswitch blocking
- adequate access to an operator or recorded intercept to all vacant codes and numbers
- <1% of intercepted calls may encounter busy/no-circuit available conditions</p>
- etc. . . . (3) and (5)

480-120-440 Repair Standards (9)

- © Co. must repair all O/S interruptions ≤ 48 hours
- O/S = inability to use phone for originating or receiving calls, does not apply to unregulated services such as voice messaging, inside wiring, or CPE
- ② All other regulated service impairments ≤ 72 hours
- Sundays & legal holidays not considered working days, excluded from 48 & 72 hour requirements

480-120-133 Response time – B.O. or repair center (reg. bus. hours) (10)

- @ call must be answered by live rep or automated call answering system Automated:
 - Avg. time must not exceed 30 seconds
 - Option to speak with a live rep within first 60 seconds
 - transfer caller to rep. within first 60 seconds
 - Caller to take affirmative action to speak with a live rep
 - Avg. time until live rep. answers call may not exceed 60 seconds.

Live Rep:

99% of call attempts must be answered within 30 seconds